

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO – WESTERN DIVISION
AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, KALEIGH PISCIONERI, Special Agent (“SA”) with the Federal Bureau of Investigation (“FBI”), being duly sworn, hereby depose and state as follows:

INTRODUCTION

1. I am an SA with the FBI, an investigative and law enforcement officer of the United States within the meaning of Rule 41(a)(2)(C) of the Federal Rules of Criminal Procedure. I have been employed by the FBI since June of 2019 and have been employed as a SA since April 2023. I am currently assigned to the FBI Cleveland Division Cyber Squad, which is responsible for investigations involving computer-related offenses. I have received specialized training at the FBI Academy, in Quantico, Virginia, in a variety of Federal criminal violations, including training on how to conduct surveillance, electronic and physical searches, interview and interrogation techniques, financial investigations (including asset forfeiture and money laundering tactics), evidence collection, responding to and investigating weapons of mass destruction, arrest and search warrant executions, and case preparation. In my previous professional support roles in the FBI, I have assisted with various financial crime, drug, and online investigations, analyzed pen register and telephone toll data, conducted open source social media research, analyzed financial records, participated in witness and subject interviews, and participated in the execution of warrants to include the search and seizure of electronic communications accounts, to include emails, social media accounts, messaging applications, and other electronically stored information.

2. I am currently a member of the Midwestern Cryptocurrency Task Force. As such, I have received training on blockchain analysis, to include training related to virtual currency, including identifying and tracing virtual currency transactions, and seizing virtual currency.

3. This affidavit is made in support of an arrest warrant for DILEEP KUMAR SAKINENI (“SAKINENI”) and SAI HRUTHIK THODETI (“THODETI”) for Conspiracy to Commit Wire Fraud, in violation of Title 18, United States Code, Section 1349, and Money Laundering Conspiracy, in violation of Title 18, United States Code, Section 1956(h).

4. I have personally participated in the investigation of SAKINENI, THODETI, and others, as discussed below. I am familiar with the facts and circumstances of this investigation, through discussions with other law enforcement agents involved in this investigation. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

PROBABLE CAUSE

5. D.M. is 73-year-old resident of Lima, Ohio. On or about September 21, 2023, D.M. received a phone call from an individual claiming to be from Amazon.com, Inc., advising D.M. of suspicious activity on multiple Amazon accounts in her name. D.M. was then transferred to CYNTHIA LEE (“LEE”) who purportedly worked at the Federal Trade Commission. LEE advised D.M. that she was a victim of identity fraud and then transferred D.M. to OSCAR WHITE at the Drug Enforcement Agency (“DEA”). WHITE provided D.M. with WHITE’s purported phone number, 202-618-7635. Although the number had a Washington, D.C. area code, records indicate it was actually registered through Sinch, a company headquartered in Stockholm, Sweden.¹ WHITE also provided D.M. with a picture of his DEA badge and badge number shown below:



6. WHITE advised D.M. that she had multiple arrest warrants outstanding for fraudulent accounts all over the United States to include multiple bitcoin accounts and \$7,300,000 dollars in fraud in the United States, China, Columbia, and Mexico. Due to these supposed fraud charges, WHITE stated that D.M. needed to liquidate all of her accounts and send the money to WHITE.

7. On or about September 22, 2023, D.M. obtained a cashier's check for approximately \$99,715 from her bank account at Superior Credit Union. The following day, to follow WHITES's instructions, D.M. used the cashier's check to purchase approximately 40 one-ounce gold bars from a gold and jewelry retailer in Wapakoneta, Ohio.

8. On or about September 25, 2023, in order to satisfy WHITE's requests, D.M. took out a Home Equity Line of Credit for approximately \$170,000 in cash from Premier Bank.

9. On or about September 27, 2023, WHITE instructed D.M. to deliver the gold bars D.M. had obtained to a purported undercover detective in the parking lot of the Dollar General located on Shawnee Road in Lima, Ohio. D.M. sent WHITE a picture of what she was wearing and then met and gave the gold bars to a person she described as an unknown black male in a dark colored sedan parked at the Dollar General.

10. On or about September 29, 2023, WHITE advised D.M. to deliver the cash to a different purported undercover detective in the parking lot of a Burger King located on Shawnee Road in Lima, Ohio. D.M. met at the parking lot and gave the cash to a person she described as an unknown white male in a Ford SUV with Illinois license plates.

11. After dropping off the gold and money, D.M. received alleged United States Department of Treasury receipts, example shown below, via text message for both drop offs, within hours after the drop off:

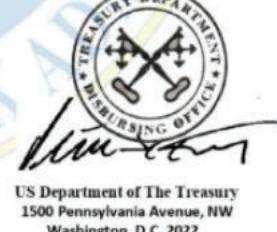
Transaction Details	
US Department of The Treasury 1500 Pennsylvania Avenue, NW Washington, D.C. 20220	
I-3054C	
OMB No. 2023-8173	
Date - 09-29-2023	
CASE NUMBER OMB 2023/8173	RECIPIENT NAME D [REDACTED]
RECEIPT DATE 09-29-2023	VICTIM'S ADDRESS [REDACTED]
Officer In Charge DEA Special Agent Oscar White	

The following transaction are being verified by U . S . Department of Treasury.

Details of the transaction given below :-

Item	Price	Qty	Subtotal
1 OZ Gold Bar	\$2035.00	49	\$99,715.00
100 Denomination Dollar Bills	\$100	1700	\$170,000.00
	Total		\$269,715.00

Dated: 09-29-2023



US Department of The Treasury
 1500 Pennsylvania Avenue, NW
 Washington, D.C. 20220

12. Given the short period of elapsed time between the drops and the issuance of receipts, it appeared to agents that members of the scheme were traveling to a location near Lima after receipt of the drop items to count the gold bars and/or cash immediately after receipt.

13. On or about October 2, 2023, WHITE advised D.M. that she needed to liquidate more of her accounts in order to get rid of the pending accusations against her. D.M. agreed and liquidated additional accounts. D.M. advised WHITE of the liquidation. WHITE then told D.M. that she would also need to sell her house and cabin located in southern Ohio. On October 5, 2023, D.M. filed a police report with the Shawnee Township Police Department.

14. After filing the report, D.M. maintained contact with WHITE, but briefed officers and agents as communications occurred. Shortly after the report, WHITE requested \$127,000 from D.M.

15. On October 12, 2023, WHITE had a phone conversation with D.M. During the conversation, WHITE told D.M. to obtain \$100,000 cash from her bank on October 13, 2023. WHITE instructed D.M. to take pictures of the cash and drop it with a purported undercover detective at her bank location in Lima. After D.M. conveyed that information to agents, FBI obtained \$100,000 in controlled funds with the intent to conduct a controlled delivery of the funds to the purported undercover detective.

FBI OPERATION ON OCTOBER 13, 2023

16. On October 13, 2023, WHITE called D.M., and acting on WHITE's instructions, D.M. went to the bank to obtain \$100,000 in cash. At the bank, FBI provided D.M. with \$100,000 in controlled funds containing a tracking device. D.M. then went home and took a picture of herself and pictures of the cash to send to WHITE. After receiving the pictures, WHITE instructed D.M. to put the cash and banker bag in plastic grocery bags and go to the

CVS on West Breese Road in Lima, Ohio to drop off the money to a purported undercover detective. D.M. drove to CVS and parked in the parking lot with the cash. WHITE then instructed her to send him a picture of herself outside of her vehicle.

17. FBI agents and local law enforcement conducted surveillance around the CVS and in the Lima area. FBI agents observed a grey Nissan Ultima, (“SUBJECT VEHICLE 1”) driven by a male individual later identified as Dileep Kumar SAKINENI, park near D.M.’s vehicle. SAKINENI then pulled behind D.M.’s vehicle at which time WHITE instructed D.M. to place the money through the rear passenger window of SUBJECT VEHICLE 1. D.M. followed the instructions and delivered the money package. SUBJECT VEHICLE 1 then departed. Agents followed SUBJECT VEHICLE 1 to a gas station located on Shawnee Road in Lima, OH and observed SAKINENI sitting in SUBJECT VEHICLE 1.

18. After staying at the gas station for a period of time, SAKINENI then drove to a Dairy Queen, also located on Shawnee Road in Lima, Ohio. After sitting in the vehicle for a short duration of time at Dairy Queen, SAKINENI then turned around in a nearby parking lot, and proceeded South to I-75 and drove South on I-75 to the Dayton, Ohio area.

19. Law enforcement officers followed SAKINENI to a Shell gas station, located on Kauffman Avenue in Fairborn, Ohio. After he arrived, SAKINENI stayed in his vehicle in the parking lot. After a period of time, a Hyundai Elantra (“SUBJECT VEHICLE 2”), driven by a male individual later identified as Sai Hruthik THODETI (“THODETI”), parked near SAKINENI. An additional male occupant was in the passenger seat of SUBJECT VEHICLE 2.

20. Law enforcement officers observed SAKINENI and THODETI roll down their windows and begin communicating with each other. SAKINENI then exited SUBJECT VEHICLE 1 and communicated to THODETI while also on his cell phone. SAKINENI then

repositioned SUBJECT VEHICLE 1 in a closer parking spot next to SUBJECT VEHICLE 2.

THODETI then exited SUBJECT VEHICLE 2 and began to interact with SAKINENI when law enforcement officers intervened in order to recover the controlled FBI funds.

21. While being detained, both SAKINENI and THODETI provided consent to FBI agents to search SUBJECT VEHICLE 1 and SUBJECT VEHICLE 2. During a search of SUBJECT VEHICLE 1, FBI agents recovered the \$100,000 of controlled FBI funds and tracking device from SUBJECT VEHICLE 1. During a search of SUBJECT VEHICLE 2, FBI agents recovered \$60,050 in cash and 19 one-ounce gold bars (valued at approximately \$36,972.10 at the time of this writing) from SUBJECT VEHICLE 2.

22. While being detained, SAKINENI was interviewed and told FBI agents that he was directed by an individual named PETER (no last name), who was allegedly from Tennessee with phone number 205-390-1259, to pick up \$100,000 in the CVS parking lot on West Breese Road. After SAKINENI picked up the cash from D.M., PETER instructed SAKINENI to video call him and show PETER that he had the money. PETER then instructed SAKINENI to go to the Dairy Queen on Shawnee Road in Lima, Ohio for a potential drop off that did not occur. SAKINENI said that PETER then instructed him to drive to the Shell gas station on Kauffman Avenue in Fairborn, Ohio, for a drop off. SAKINENI said that he did not know THODETI and the other individual in SUBJECT VEHICLE 2, but PETER connected them for the drop off. SAKINENI said that SUBJECT VEHICLE 1 was his friend's vehicle.

23. SAKINENI said that he had done three other pickups prior to the cash pickup on October 13, 2023, under the direction of PETER. SAKINENI said that one of the pickups involved gold, and that he previously picked up cash from D.M. at the Burger King located on Shawnee Road in Lima, Ohio in a Ford Explorer. After the pickups, PETER instructed

SAKINENI to proceed to other locations to drop the gold and/or cash off. The drop off locations were mainly in the Dayton and Cincinnati area. SAKINENI was recommended by a friend to work for PETER, and he in turn recommended two of his friends to work for PETER.

24. While being detained, THODETI was interviewed and told FBI agents that he was directed by an individual from Cincinnati, Ohio named Avi Patell (“AVI”), phone number 513-372-1686, to pick up cash and gold from a 60-year-old male at Walmart, located on Wagner Avenue in Greenville, Ohio. THODETI did so. AVI put THODETI in touch with PETER, phone number 205-390-1259, who THODETI only knew by phone number. PETER instructed THODETI to initially go to the Dairy Queen on Shawnee Road in Lima, Ohio for a drop off, but THODETI did not go there. PETER then instructed AVI to go to the Shell gas station on Kauffman Avenue in Fairborn, Ohio for a drop off. THODETI said that PETER told him to call SAKINENI and PETER sent him SAKINENI’s contact information. THODETI then said he contacted SAKINENI with his location and told him that he arrived at the Shell gas station for a drop off. THODETI said that he has done previous cash pickups before, to include a pickup with AVI.

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CONCLUSION

25. Based on the totality of the facts and circumstances set forth herein, and based upon my training and experience, there is probable cause to believe that in October of 2023, in the Northern District of Ohio, the Southern District of Ohio, and elsewhere, DILEEP KUMAR SAKINENI and SAI HRUTHIK THODETI conspired together with each and others to commit wire fraud, in violation of Title 18, United States Code, Section 1349, as well as to receive monetary instruments or funds derived from specified unlawful activity, in violation of Title 18, United States Code, Section 1956(h).



SPECIAL AGENT KALEIGH PISCIONERI
FEDERAL BUREAU OF INVESTIGATION

Sworn to via telephone after submission by reliable electronic means, pursuant to Fed. Crim. R. 4.1 and 41(d)(3) this 16th day of October, 2023.



Darrell A. Clay
United States Magistrate Judge